

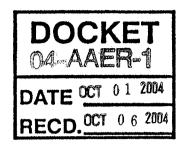
October 1, 2004

Docket Office California Energy Commission 1516 Ninth Street, Mail Station 4 Sacramento, CA 95814-5512

Subject:

Docket No. 04-AAER-1

To Whom It May Concern:



As the developer of both the original pre-rinse unit spray valve and the low-flow spray valve, T&S Brass and Bronze Works, Inc. is excited about the recent activities taken by the CEC to regulate, and in some applications, mandate the use of energy saving low-flow pre-rinse unit spray valves.

In support of this effort, and in response to the 45-Day Language put out for review on September 10, 2004, T&S respectfully submits the following comments:

- 1. <u>Section 1605.1(h)(4)</u>: "...Commercial Pre-rinse Spray Valves" should be changed to, "...Commercial Pre-rinse Unit Spray Valves that are installed and used in conjunction with commercial dishwashing and ware washing equipment." *Rationale*: "Commercial Pre-rinse Spray Valves" is too general a description. Many products with this name are used as pot and kettle fillers, kitchen wash down stations, etc., where a high flow rate is important. For example, when used as a pot/kettle filler, the end user must hold the valve open until the large pot/kettle is filled. At 1.6 (or less) flow rate, the time to fill the container is increased by a factor of about 3 with no resulting water or energy savings.
- 2. <u>Section 1605.3(h)(3)</u>: "...Commercial Pre-rinse Spray Valves" should be changed to, "...Commercial Pre-rinse Unit Spray Valves that are installed and used in conjunction with commercial dishwashing and ware washing equipment." Rationale: See above.
- 3. Section 1607(d)(8): Suggest that the marking requirement be applicable to low-flow pre-rinse unit spray valves only. Further suggest that marking of product packaging and sales/specification drawings is sufficient.

 Rationale: Requiring a marking of this type on spray valves that are not part of the water & energy savings programs is cost prohibitive and a major hardship for manufacturers. Marking only the low-flow units suffices to identify what products have been evaluated for the purposes of the CEC ruling. Marking packaging versus the individual products will result in a significantly lower cost to manufacturers.









The undersigned will attend the October 13 hearing at CEC. If you should have any questions about the preceding comments/suggestions and wish to contact T&S prior to the hearing, contact information is included below.

Thank you for your consideration of these comments.

Sincerely

Mark V. Weaver, P.E. Engineering Manager

T&S Brass and Bronze Works, Inc.

P.O. Box 1088

2 Saddleback Cove

Travelers Rest, SC 29690

864-834-6756 office

864-834-3518 fax

mweaver@tsbrass.com

Cc: Mr. Claude Theisen T&S Brass and Bronze Works

Ms. Kem Davis T&S Brass and Bronze Works

Ms. Teri Cain T&S Brass and Bronze Works

Mr. Charles Bohlig Food Service Technology Center

Mr. David Viola Plumbing Manufacturers Institute